

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax, Inc. Customer
Data Security Breach Litigation

MDL Docket No. 2800
1:17-md-2800-TWT

This document relates to:
CONSUMER ACTIONS

Carson Block v. Equifax, Inc. et al.
No. 1:17-cv-05341-TWT

**DEFENDANT GRAEME PAYNE’S MOTION TO ADOPT EQUIFAX CO-
DEFENDANTS’ RESPONSE IN OPPOSITION TO PLAINTIFF BLOCK’S
MOTION TO ESTABLISH A SEPARATE DISCOVERY TRACK**

COMES NOW Defendant Graeme Payne, by and through counsel, and hereby submits this Motion to adopt the Response in Opposition to Plaintiff Block’s Motion to Establish A Separate Discovery Track (“Response”) of Defendants Equifax, Inc., Mary Hannan, Harold Boutin, Robert Friedrich, Vidya Sagar Jagadam, Lara Pearson, Shea Giesler, and Cliff Barbier (“Equifax Co-Defendants”) (Doc. 506 in 1:17-md-2800-TWT, Doc. 55 in 1:17-cv-05341-TWT).

Defendant Payne has standing to adopt the Response because the legal basis for his opposition is the same as that of the Equifax Defendants. Further, by simply adopting and incorporating the Response, the Court’s docket is less cluttered with duplicative filings. A proposed order is included herewith.

Respectfully submitted, this 14th day of November, 2018.

s/ Anthony L. Cochran

Anthony L. Cochran

Georgia Bar No. 172425

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STATEMENT OF COMPLIANCE

I hereby certify that the foregoing motion has been prepared using 14-inch Times New Roman font, in accordance with LR 5.1C.

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2018, I electronically filed the foregoing DEFENDANT GRAEME PAYNE'S MOTION TO ADOPT EQUIFAX CO-DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF BLOCK'S MOTION TO ESTABLISH A SEPARATE DISCOVERY TRACK with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

s/ Anthony L. Cochran _____

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